

**EDWIN COOPER**

PETROLEUM ADDITIVES

Edwin Cooper Division  
Sauget, Illinois 62201  
(618) 274-4000

June 25, 1984

CERTIFIED MAIL

Director, Waste Management Division  
U. S. EPA Region V  
230 South Dearborn Street  
Chicago, IL 60604

ATTENTION: Mr. Dan Hopkins, Remedial Response Branch  
(SHR-13)

RE: Administrative Order: Docket No. V-W-84-007

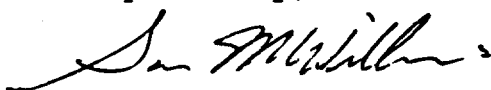
Dear Mr. Hopkins:

Edwin Cooper, Inc. submits the attached proposal for further investigation and definition of the 2,3,7,8-TCDD at the facility as required in paragraph 12.C(i-v) of the referred to administrative order.

In addition, per paragraph 12.D of the referred to administrative order, Edwin Cooper, Inc. is requesting a conference with the EPA to discuss the attached proposal.

Please contact me concerning any questions you may have on this proposal and on a date you might propose for the above-requested conference.

Respectfully,



Sam McWilliams  
Plant Manager

cc  
attachment

cc: H. F. Mason  
J. L. Sparks  
D. E. Park - Baton Rouge  
D. L. Bach - Baton Rouge

- i) a sampling plan for determining the lateral and vertical extent of 2,3,7,8-TCDD in the soil within the facility and outside the facility (including the extent of contamination in the piled earth in Areas A, B, and C);

### PROPOSAL

Edwin Cooper Incorporated, Sauget, Illinois, proposes to conduct the following biased sampling to determine the lateral and vertical extent of 2,3,7,8-TCDD in the soil within the facility.

Initial soil samples will be taken to determine whether 2,3,7,8-TCDD is present in the soil at ECI. Biased samples will be taken on the perimeter of the ECI facility and in those areas where it has been presumed that Monsanto produced and/or stored Agent Orange while the property was under Monsanto's ownership. These samples will be surficial. The maximum depth will be two inches below existing ground surface.

If 2,3,7,8-TCDD is detected in the construction project area, additional biased soil sampling will be performed to verify initial results. These samples will also determine the lateral extent of any contamination in the project area. This sampling will be done to establish construction practices and protective measures to be employed while completing the construction in the Unit 268 site.

Based on the results of previous sampling at ECI, if the presence of 2,3,7,8-TCDD is detected in the soil, then additional biased samples will be obtained. These samples will be taken to determine the lateral extent of contamination.

If necessary, samples to determine the vertical extent of contamination to a depth of 18" below ground surface will be taken. In addition soil sampling will be conducted in Area C, as described in the Administrative order No. V-W-84-007, to determine whether 2,3,7,8-TCDD is present in the soil that was previously removed from the construction site and placed in the described area of the facility. The sample will be a composite representative of the soil removed from the Unit 268 construction area.

If 2,3,7,8-TCDD is detected in the location of the Unit 268 construction project, area samples will also be taken in those areas of the construction project which will be sealed with asphalt or concrete. A sampling plan for the construction project area samples will be submitted.

If 2,3,7,8-TCDD is detected in significant amounts in those samples obtained to determine the vertical extent of contamination to a depth of 18" below ground surface, additional core samples will

be taken at two locations to further delineate the vertical extent of contamination within ECI. The core samples will be taken to a depth exceeding the highest seasonal water level underlying the facility as determined by the U.S. Geological Survey. The core sample will be segmented into 6 inch lengths with alternate segments being analyzed for 2,3,7,8-TCDD. All segments will be preserved and retained.

ECI will rely on data obtained by Monsanto to determine the extent, if any, of horizontal or vertical 2,3,7,8-TCDD contamination to the east and south of the facility. Illinois EPA has obtained soil samples north of ECI. These data will be requested. The boundary to the west is paved and owned by Amax Zinc. A sample will be taken along the west property boundary inside the ECI facility. If the results of this sample indicate the presence of 2,3,7,8-TCDD in significant amounts, the need for additional sampling will be evaluated.

- ii. in the event that the vertical extent of 2,3,7,8-TCDD contamination exceeds at any point the highest seasonal water level underlying the facility (as determined by the U. S. Geological Survey or other similar authority), the proposal shall include a geological and hydrological study and a sampling plan for determining the extent, if any, of 2,3,7,8-TCDD contamination in the ground-water as a result of a release from the facility;

### **PROPOSAL**

Edwin Cooper proposes to determine the highest seasonal water level underlying the facility by accessing the data base for the U. S. Geological Survey. It has been indicated in previous meetings that the Agency will assist in obtaining these data.

If the presence of 2,3,7,8-TCDD is detected in significant amounts below the highest seasonal water level underlying the facility, a geological and hydrological study proposal will be prepared. Also, if 2,3,7,8-TCDD should be detected as above, a sampling proposal to determine the presence of, if any, 2,3,7,8-TCDD in the groundwater will be submitted.

- iii. a plan for identifying and locating sewer lines, buried pipe, and equipment which may be contaminated with 2,3,7,8-TCDD and ascertaining the extent of such contamination.

### PROPOSAL

ECI proposes to identify and locate existing and previously used sewer lines. The investigation will attempt to locate sewer lines in those areas of the property presumed to have been associated with the production and/or storage of Agent Orange which have potential to allow the migration of 2,3,7,8-TCDD, if any, into the environment.

A thorough and diligent search of existing blueprints for the ECI property will be conducted to ascertain the location of present sewer system lines and any sewer reconstruction/modification that may have been completed since Ethyl Corporation purchased the property.

A sample will be taken of any sediment/sludge in a manhole located in the existing sewer line serving Unit 268. This sewer line drained the area where Agent Orange is presumed to have been manufactured by Monsanto. The sample will be used to determine the presence, if any, of 2,3,7,8-TCDD in the sewer. If 2,3,7,8-TCDD is detected in significant amounts, a down-gradient sample will be taken in the sewer line to determine the extent of the contamination.

To our knowledge, Monsanto did not locate process pipelines underground. When the unit used to manufacture Agent Orange was dismantled, no process equipment was buried on ECI property. ECI has no reason to believe that there will be any buried pipe in the location of the presumed manufacture and/or storage of the Agent Orange.

ECI proposes to obtain information from the engineer charged with responsibility for dismantling the equipment remaining in the Unit 268 area for the presumed production of Agent Orange by Monsanto. This information will include: ultimate disposition of equipment; and extent of residues/sludges, if any, or materials remaining in or on the equipment when dismantled.

- iv. a study of the topographic conditions at the facility which may affect the transmission of 2,3,7,8-TCDD through water runoff or otherwise.

#### PROPOSAL

ECI proposes to obtain a U. S. Geological Survey 7.5 minute map containing the ECI location. In addition, we will attempt to obtain a copy of any land survey conducted when property ownership was transferred. A hydraulic gradient for surface water run-off will be determined from the available information.

We will determine which areas of the facility are covered with impervious materials to facilitate storm water run-off from ECI. Any significant topographic conditions on the ECI property will be identified and located on a plant plot plan.

- v. a study of the history of the facility which will identify areas of Agent Orange formulation and other likely areas of 2,3,7,8-TCDD contamination.

#### PROPOSAL

It is presumed that Agent Orange was manufactured and/or stored by Monsanto Co. at the following locations: the present ECI Unit 268 and the "Black Tanks" located east of Unit 268.

ECI has no history or manufacturing records for the Agent Orange production other than the above presumption. The production of Agent Orange occurred prior to our ownership of the property and had been discontinued prior to our purchase of the property.

- vi. the plan shall be accompanied by a detailed work plan, safety plan and quality assurance/quality control plan for implementation of the tasks set forth above.

PROPOSAL

Table I addresses the detailed work plan, safety plan and quality assurance/quality control plan which will be used for each of the items required in Administrative Order: Docket Number V-W-84-007, Paragraph 12.C. (i through v).



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